

226964 ORIGINAL  
(Red)



June 29, 1994

**VIA AIRBORNE**

Mr. Gary Morton (3HW11)  
United States Environmental Protection Agency  
Region III  
841 Chestnut St.  
Philadelphia, PA 19107

Re: **Butler Tunnel Site**  
**Luzerne County, Pennsylvania**

Dear Mr. Morton:

Enclosed is the response to the Section 104(e) of CERCLA Request for Information submitted to the Crouse-Hinds Division of Cooper Industries, Inc. (hereinafter "Cooper"). Cooper was granted an extension to respond to this request until June 30, 1994 by Kathleen Root of the Office of Regional Counsel.

In order to respond to this request, a reasonable search of the records of Cooper has been made. Copies of those documents relevant to the request are attached. Cooper's response specifically relates to the business relationship between Crouse-Hinds and Northeast Oil Services Co. Cooper will supplement its response at the earliest possible time if and when subsequent information becomes available.

We trust the attached information is responsive to your request.

Very truly yours,

*W. Anne Lemelle*

W. Anne Lemelle  
Legal Assistant, Environmental

Enclosure

cc w/enclosure: Ceil Price  
Ron Sandberg  
Tony Black  
Mike O'Brien  
Brian Biittner - Crouse-Hinds, Syracuse, NY

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**RESPONSE - BUTLER TUNNEL SITE  
CROUSE-HINDS DIVISION OF  
COOPER INDUSTRIES, INC.**

**ORIGINAL  
(Red)**

1. State the name of your company, its mailing address and telephone number. Further identify:

- a) The date and State(s) of incorporation and/or dissolution of your company;
- b) The date and original State of incorporation, if any, of your company; and
- c) The parent corporation of your company, if any, and all subsidiaries or other affiliated entities.
- d) The name and State(s) of incorporation of any successor corporation or company.

**Response:** Cooper Industries, Inc. acquired the Crouse-Hinds Company (a New York corporation) in 1981. Effective January 1, 1983, Crouse-Hinds became an unincorporated division of Cooper Industries, Inc. (hereinafter "Cooper"). Cooper is an Ohio corporation, incorporated in 1919. Cooper is the parent company of Crouse-Hinds and several other divisions and subsidiaries. (Cooper's 1993 Annual Report is attached for your reference.) The address and telephone number for the corporate headquarters of Cooper are:

Cooper Industries, Inc.  
1001 Fannin, Suite 4000  
P. O. Box 4446  
Houston, Texas 77210  
(713) 739-5400

2. Describe the nature of your company's operations between 1977 and 1979. Identify all persons currently or previously employed by your company who have or may have personal knowledge of your company operations during this time period. For each such person, state that person's employer, job title, dates of employment, current address and phone number. If the current phone number or address is not available, provide the last known phone number or last known address of such person.

**Response:** Crouse-Hinds manufactured electrical lighting, plugs, receptacles, enclosures, and fittings for application in severe and explosive environments. Operations included iron and aluminum casting, machining, plating, painting, plastics molding, assembly, packaging, warehousing, and shipping.

3. Describe the types of documents generated or maintained by you/~~your~~ company concerning the handling and/or generation, storage, treatment, disposal, recycling, formulation, or transportation of any hazardous substance, hazardous waste, pollutant, contaminant, or other waste at your company between 1976 through 1979.

**Response:** All documents, including purchase orders and invoices related to the commercial arrangements for transportation and disposal, do not exist for the period 1976 through 1979. The following responses relate specifically to the "Purchase Order" referenced as "Attachment C" to the EPA letter and Request for Information.

a) Provide a description of the information included in each type of document.

**Response:** Information contained on Attachment C includes: the contractor, a general waste description, cost per unit, pick-up point, and duration of purchase order.

b) Identify any person(s) who in the past was the custodian of, such documentation and identify the person(s) who is currently the custodian of the such (sic) documentation.

**Response:** Louis Eldred in the Purchasing Department generated the order. Orders are maintained in Purchasing files for a period not to exceed ten years. Crouse-Hinds does not currently have a Purchasing Manager since the unexpected death of their previous Purchasing Manager approximately two years ago. The person at Crouse-Hinds who currently performs most of those functions is George Brindak, Supplier Coordinator.

c) Describe any permits or permit applications and any correspondence between you/your company and any regulatory agencies regarding the transportation of wastes for disposal; and

**Response:** Cooper has no documents or information regarding permits or permit applications relating to waste transportation or disposal for the subject period.

d) Any correspondence between you/your company and any third party regarding such wastes and their disposal.

**Response:** Cooper has no such documents or information.

4. Identify each and every hazardous substance used in the period between 1976 through 1979 and/or generated, stored, transported, treated, disposed of, released, or otherwise handled at your facility and, with respect to each such hazardous substance, further identify:

- a) The processes by which any hazardous substances were used, generated, stored, transported, treated, disposed, or otherwise handled;
- b) The procedures by which any hazardous substances described in "a)" above was stored, transported, treated, disposed, or otherwise handled;
- c) The chemical composition, characteristics, physical state (solid, liquid, or gas) of each such hazardous substance so used or generated;
- d) The chemical composition, characteristics, physical state (solid, liquid, or gas) of each such hazardous substance stored, transported, treated, disposed, or otherwise handled;
- e) The specific quantity of each such hazardous substance stored, transported, treated, disposed, or otherwise handled at your facility.

**Response:** Crouse-Hinds utilizes many different types of processes in its manufacturing operations, and therefore, generates many different wastes from those operations. Although purchasing records are unavailable, some generalizations can be made concerning hazardous substances used in processes from 1976 through 1979.

Foundry core making operations used a variety of binder formulations including ester resins, phenolic isocyanates and vegetable oils.

Metal machining operations used cutting oils, hydraulic fluids, greases, and paraffinic solvents.

Metal cleaning and washing operations used acid and alkaline cleaners to remove dirt and oils prior to painting or plating. The active ingredients in these cleaners were hydrochloric acid, sulfuric acid, phosphoric acid, nitric acid, sodium hydroxide, trisodium phosphate, and sodium metasilicate.

Painting operations used a variety of waterborne and solvent based paints and thinners. Xylene, toluene, acetone, methyl ethyl ketone, and alcohols were part of the formulations. Parts were prepared for painting using spray washes containing phosphate and chromium.

Plating operations consisted of zinc electroplating and bright dipping. Materials used in plating included zinc, zinc chloride, ammonia hydroxide, chromium, glycol ether, and methanol.

Plastics molding operations used a polyester resin containing styrene. Clean-up was accomplished with a solvent mixture containing methylene chloride, trichloroethane, acetone, and toluene.

General plant maintenance operations used lubricants and paraffinic solvents in servicing and rebuilding production equipment.

5. Identify all by-products and wastes produced through the operation of your facility (including generic or brand name and chemical composition). With respect to each such by-product and waste identified, further provide:

**Response:** A light machining oil was used in the machining of metal parts throughout the facility. Aqueous cleaning operations removed this oil. Wastewater from parts cleaning operations flowed through a 15,000 gallon American Petroleum Institute (API) gravity type oil/water separator prior to discharge to the Onondaga County Metropolitan Treatment Plant. Two rotating drum skimmers removed floatable oil that rose to the surface of the separator.

- a) A description of how each by-product or waste was stored, transported, and disposed of;

**Response:** The oil was stored in a 1,500 gallon tank. Northeast Oil Services was contracted by Crouse-Hinds to remove oil from this tank in the oil recovery building. Cooper has no records or knowledge of actual disposal activities.

- b) The quantities of such by-products and wastes so generated, stored, treated, transported, disposed of, or otherwise handled;

**Response:** Cooper has no such records or information.

- c) The name of the individual(s) and/or company(ies) who transported and/or disposed of or treated such by-products or wastes; and

**Response:** Northeast Oil Services removed and transported oil accumulated in the oil recovery building storage tank during the subject period.

- d) The location of final disposal of each by-product or waste.

**Response:** Cooper has no such knowledge or information .

6. Please provide in detail any past business relations you/your company may have had regarding transportation, disposal and/or treatment of any wastes by the Northeast Oil Service Co. and/or Hudson Oil Refining Company and/or Newton Refinery Co., including, but not limited to:

- a) Any correspondence between your company and Northeast Oil Service Co. and/or Hudson Oil Refining Company and/or Newton Refinery Co.;

b) Any correspondence between your company and any regulatory agencies regarding your company's dealings with the Northeast Oil Service Co. and/or Hudson Oil Refining Company and/or Newtown Refinery Co.;

**Response:** Cooper has no records of transactions or communications between Crouse-Hinds and Northeast Oil Service Co., Hudson Oil Refining Co., or Newton Refinery Co. Information was obtained from the recollection of employees who were employed at Crouse-Hinds during the subject period.

7. The following questions concern the attached Purchase Order from Crouse-Hinds to Northeast Oil Services dated January 24, 1977, attached hereto as Attachment C:

a) Did Northeast Oil remove waste from your facility from (sic) at any time from March 15, 1977 to March 15, 1978?

**Response:** Crouse-Hinds employees who were interviewed about this matter do not specifically recall witnessing an oil pick-up by Northeast Oil Services. Cooper does not refute the information on the Purchase Order.

b) With respect to the "oil recovery Bldg.", please: i) identify the location of this building; ii) identify the function/purpose of this building during 1977 through 1978; and iii) is this building currently being used?

**Response:** The "oil recovery Bldg." is located on the northwest corner of the iron foundry. The iron foundry is located centrally in the Crouse-Hinds manufacturing facility at Wolf and Seventh North Streets in Syracuse, New York.

This building houses a 15,000 gallon API gravity type oil/water separator. Wastewater from parts cleaning operations flowed through the separator prior to discharge to Onondaga County Metropolitan Treatment Plant. Two rotating drum skimmers removed floatable oil that rose to the surface of the separator. This oil consisted of a light machining oil that was used in the machining of metal parts throughout the facility. The oil was stored in a 1,500 gallon tank. This building and the oil/water separator are currently in use.

c) Please explain what the following words/phrases mean: i) "Vendor"; ii) "This order replaces F144416M"; and iii) "Maint. Rec."

**Response:** i) Vendor refers to Northeast Oil Services.  
ii) The meaning of "This order replaces F144416M" is unknown. Records on F144416M do not exist in Crouse-Hinds' files.

d) Please describe the nature of the chemicals, compounds, and/or substances (including their constituents and their physical states [i.e. liquid, solid, etc.]), produced, stored, or handled in the oil recovery building from 1977 to 1979.

**Response:** The only substance stored in the oil recovery building was the light petroleum machining oil skimmed from the continuously flowing wastewater.

c)(sic) e) If Northeast Oil did fill this purchase order, please describe the nature of the chemicals, compounds, and/or substances (including their constituents and their physical states [i.e. liquid, solid, etc.]), which Northeast Oil removed from the oil recovery building from March 15, 1977 to March 15, 1978.

**Response:** Cooper has no additional information regarding the purchase order other than what has been provided. Please refer to our response to Question 7.d) above.

d)(sic) f) Where did Northeast Oil transport these wastes once removed from the "oil recovery Bldg."?

**Response:** Cooper has no such knowledge or information.

e)(sic) g) Between March 1977 and March 1978, what volume of waste did Northeast Oil remove from the Crouse-Hinds facility? Please provide all documents relevant to your response.

**Response:** Cooper has no such knowledge or information.

f)(sic) h) Please describe the process by which these wastes were generated.

**Response:** Please refer to Cooper's response to Question 7.b) above.

g)(sic) i) Please identify the name of the person whose signature follows the words "Purchasing Approval".

**Response:** Louis Eldred

g)(sic) j) Did Northeast Oil Services ever remove any other wastes from your facility under any other agreement? If so, please describe such wastes in detail, the process by which they were generated, and the details of such agreement for removal.

**Response:** Cooper has no records regarding Northeast Oil Services. Crouse-Hinds employees have no recollection of any other waste pickups by Northeast Oil Services.

8. Did Crouse-Hinds utilize any other company, besides Northeast Oil, to remove and/or transport waste from the Crouse-Hinds facility for disposal from 1977 to 1979? If so, please identify the company or companies, describe the wastes removed and transported for disposal, and identify the location of disposal.

**Response:** Cooper has no documentation or information regarding any other company it may have used to remove and/or transport waste from the Crouse-Hinds facility during the subject period.

9. Please identify individual(s) at Crouse-Hinds who were responsible for arranging for the removal and disposal of wastes, and individual(s) who were responsible for payments, payment approvals, and record keeping concerning such transactions. Provide current addresses and telephone numbers where they may be reached.

**Response:** General solid waste removal was handled by the Yard Department under the supervision of Michael Mariano, who is now deceased. The Maintenance Supervisor, Anthony Bennie, directed the plumbers who assisted in the pick-up of oil from the oil recovery building. Louis Eldred was the Purchasing Agent responsible for contract negotiation and award. Please refer to our response to Question 11 below for current addresses and telephone number.

a) Identify individuals from Northeast Oil and from any other transporters (including truck drivers, dispatchers, managers, etc.) with whom Crouse-Hinds dealt concerning removal and transportation for disposal of any wastes generated at the Crouse-Hinds facility.

**Response:** Cooper has no such knowledge or information.

b) Please provide any Crouse-Hinds company documents which pertain to any waste pick-ups relevant to the attached purchase order, including, but not limited to, receipts, invoices, trip tickets, bills of lading, manifests, logs, and memoranda.

**Response:** Cooper has no such documentation or information.

10. The following questions concern the attached portion from Harry Sutton's Deposition dated September 9, 1986; attached hereto as Attachments D and D-1.

a) Please describe the types of trucks which Northeast Oil or any other waste hauler used to transport waste from the Crouse-Hinds facility. Please describe the size of any waste removal trucks and any logos or any other distinguishing features.

**Response:** Cooper has no such knowledge or information.



11. Representative of Your Company:

a) Identify the person(s) answering these questions on behalf of your company, including full name, mailing address, business telephone number, and relationship to the company.

W. Anne Lemelle  
Legal Assistant, Environmental  
Cooper Industries, Inc.  
P. O. Box 4446  
Houston, TX 77210  
(713) 739-5655

Brian Biittner  
Manager, Engineering Services  
Crouse-Hinds Division  
Cooper Industries, Inc.  
P. O. Box 4999  
Syracuse, NY 13221  
(315) 477-7000

Barry Christiansen  
Controller, Crouse-Hinds Division  
Cooper Industries, Inc.  
P. O. Box 4999  
Syracuse, NY 13221  
(315) 477-7000

Ronald Francis  
Manager Process Support Engineering (current title)  
Facilities Engineering and Maintenance (title  
during subject period)  
Crouse-Hinds Division  
Cooper Industries, Inc.  
P. O. Box 4999  
Syracuse, NY 13221  
(315) 477-7000

David Ronkainen  
Manager of Environmental Technology  
Cooper Industries, Inc.  
P. O. Box 4446  
Houston, Texas 77210  
(713) 739-5576

Anthony Bennie (retired Crouse-Hinds employee)  
Supervisor, Maintenance  
125 Huntsville Road  
Syracuse, NY 13209  
(315) 468-2459

James Burke (retired Crouse-Hinds employee)  
Supervisor, Project Engineering  
228 Blanchard Avenue  
Syracuse, NY 13209  
(315) 635-3844

Louis Eldred (retired Crouse-Hinds employee)  
Purchasing Agent  
119 Meyrs Road  
Liverpool, NY 13088  
(315) 451-0302

b) Provide the name, title, current address, and telephone number of the individual representing your company to whom future correspondence or telephone calls should be directed.

**Response:** W. Anne Lemelle  
Legal Assistant, Environmental  
Cooper Industries, Inc.  
P. O. Box 4446  
Houston, TX 77210  
(713) 739-5655

12. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:

a) Your document retention policy;

**Response:** Attached is a copy of the Records Retention Policy and Guide, dated January 3, 1983, which has been utilized by Cooper Industries, Inc. since that time.

b) A description of how the records were destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;

**Response:** The records were destroyed approximately ten years after original generation of these documents. The exact method of destruction is undocumented.

c) A description of the type of information that would have been contained in the documents; and

**Response:** The purchase order would contain information regarding the vendor name and address, description of items/services to be purchased, quantities of items/services to be purchased, and the date or duration of purchase. The invoices would have contained

essentially the same information as the purchase order, except that the document would be issued by the vendor for payment.

d) The name, job title, and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

**Response:** Various employees with the Purchasing Department would have generated these documents (i.e, Louis Eldred). The person ultimately responsible for the retention and destruction of these documents was:

Robert Schlichting (retired Crouse-Hinds employee)  
Vice President of Finance  
8790 Horseshoe Lane  
Chittenango, NY 13037  
(315) 687-6766

